

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
LEWIS A. SMITH, JR.,	:	
Debtor	:	CHAPTER 13
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	CASE NO. 5-24-03278-MJC
	:	
LEWIS A. SMITH, JR.,	:	
Respondent	:	

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 15th day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reason:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid – 100% Plan.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Agatha R. McHale, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 15th day of April 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Jason M. Rapa, Esquire
Rapa Law Office, P.C.
141 South 1st Street
Lehigh, PA 18235

/s/ Derek M. Stroupauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee